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Joan Marsh
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July 29, 1999

RECEIVED

JUL 29 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Written Ex Parte
In the Matter of Applications for Consent to the Transfer of Control of
Licenses and Section 214 Authorizations from Ameritech Corporation,
Transferor, to SBC Communications, Inc., Transferee
CC Docket No. 98-141

Dear Ms. Salas:

This is to inform you that today a written ex parte in the form of the attached letter and Motion of Ameritech Indiana is being submitted to Thomas Krattenmaker, William Dever, and Michelle Carey.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature of Joan Marsh, consisting of a stylized 'J' and 'M' followed by a horizontal line.

Joan Marsh

cc: Thomas Krattenmaker
William Dever
Michelle Carey

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Joan Marsh
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July 29, 1999

William Dever
Federal Communications Commission
445 Twelfth Street, SW, Room 5-C266
Washington, DC 20554

Re: Notice of Written Ex Parte
In the Matter of Applications for Consent to the Transfer of Control of Licenses
and Section 214 Authorizations from Ameritech Corporation, Transferor, to SBC
Communications, Inc., Transferee, CC Docket No. 98-141


Dear Mr. Dever:

Attached please find the Motion of Ameritech Indiana to Withdraw from the Indiana URC docket established by the Indiana Commission to investigate ILEC provision of Operation Support Systems. The Motion is being submitted as yet another example of how the proposed SBC /Ameritech merger conditions can and are being interpreted by Ameritech as establishing a performance standard from which the States are discouraged from departing. Referencing the proposed merger conditions, and citing the possibility of "confusion" and "duplication of efforts," Ameritech has requested permission to withdraw outright from the OSS proceeding. Ameritech apparently believes that, given the possibility of FCC approval of the proposed merger conditions, any additional state proceedings are improper.

This Motion is particularly troubling given the much easier path available to Ameritech Indiana. Namely, Ameritech could have submitted the proposed conditions into the OSS docket so that it might inform and guide the Commission's consideration of the complex OSS issues. But Ameritech is instead seeking to have the FCC's consideration of the merger conditions act to preempt and supercede state consideration of these issues in

their entirety. If the proposed merger conditions are approved, the FCC can expect that all ILECs everywhere will seek to give the OSS and Parity of Performance conditions the same exclusively and preclusive authority.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line and a small flourish.

Joan Marsh

cc: Mr. Krattenmaker
Ms. Carey

FILED

JUL 26 1999

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

INDIANA UTILITY
REGULATORY COMMISSION

IN THE MATTER OF THE COMMISSION'S)
GENERIC INVESTIGATION OF)
INCUMBENT LOCAL EXCHANGE) Cause No. 41324
CARRIERS' PROVISION OF OPERATING)
SUPPORT SYSTEMS ("OSS"))

RESPONDENTS: INDIANA BELL TELEPHONE COMPANY, INC. D/B/A AMERITECH
INDIANA; GTE NORTH, INC. AND CONTEL OF THE SOUTH INC.; AND UNITED
TELEPHONE COMPANY D/B/A SPRINT

MOTION TO WITHDRAW FROM PROCEEDING

Respondent Indiana Bell Telephone Company, Incorporated, ("Ameritech Indiana" or
"the Company"), by its attorneys, hereby moves to withdraw from participation in the above
captioned proceeding. In support whereof, Ameritech Indiana states as follows:

1. On November 4, 1998, the Indiana Utility Regulatory Commission
("Commission") issued an order initiating this Cause. As stated in its December 2, 1998 docket
entry, one of the purposes of this cause was to determine if the incumbent local exchange carriers
("ILECs") were complying with the requirements of the FCC's Order No. 96-325, paragraph
525. To that end, the Commission and the parties have been given on-site demonstrations at
each of the incumbent local exchange carrier's ("ILEC's") OSS centers, including a
demonstration at the Ameritech OSS Service Centers in Milwaukee, Wisconsin on January 27,
1999.

2. The Commission stated that the second phase of this proceeding is to
develop appropriate performance standards for OSS. In its docket entry dated May 21, 1999, the

Commission scheduled a workshop to attempt to reach an agreement regarding development of performance standards to be held in this Cause on July 29, 1999 beginning at 10:00 a.m. in Room TC10 of the Indiana Government Center South, Indianapolis, Indiana.

3. On June 25, 1999, SBC Communications Inc., Ameritech Corporation and Ameritech Indiana prefiled the Rebuttal Testimony of James H. Kahan in *In The Matter Of The Investigation On The Commission's Own Motion Into All Matters Relating To The Merger Of Ameritech Corporation And SBC Communications Inc.*, IURC Cause No. 41255. Attached as Rebuttal Exhibit 1 to the testimony is the Voluntary Commitment of SBC Communications Inc., Ameritech and Ameritech Indiana, which addresses in Section V. A. a collaborative OSS process to be established after the Merger Closing Date.


4. On July 1, 1999, Ameritech Corporation and SBC Communications Inc., filed an *ex parte* in CC Docket No. 98-141 with the FCC which included "Proposed Conditions for FCC Order Approving SBC/Ameritech Merger" ("FCC Proposed Conditions"). In Sections III, IV and V of the FCC Proposed Conditions, Ameritech agreed to establish a collaborative process to establish OSS enhancements and additional interfaces. The FCC put the FCC Proposed Conditions out for public comment and initial comments were filed July 19, 1999 and reply comments are due July 26, 1999.

5. Due to the pendency of the above-referenced IURC and FCC dockets, the OSS collaborative process involving Ameritech Indiana may finish prior to the conclusion of the workshops in this docket. To avoid confusion and unnecessary duplication of efforts in

establishing an OSS process for Ameritech Indiana, Ameritech Indiana respectfully requests leave to withdraw from the workshop process established in the instant cause.

WHEREFORE, in view of the foregoing, Ameritech Indiana urges that its Motion To Withdraw From Proceeding be granted. conclude

Respectfully submitted,



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